



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 26, 2021

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Application GRANTED . The Clerk of Court is
directed to terminate Doc. #538. SO ORDERED.

A handwritten signature in black ink, appearing to read "Jesse M. Furman", is written over the date "July 27, 2021".

July 27, 2021

**Re: *United States v. William Vazquez-Baez,*
 S12 16 Cr. 387 (JMF)**

Dear Judge Furman:

The Government writes, on behalf of the parties, to respectfully request a five-day extension of the deadline to file motions *in limine* in this case. This is the parties' second request for a modification of the schedule governing pretrial submissions and disclosures. On July 11, 2021, the parties requested a modification of the pretrial schedule that adjourned for two weeks the parties' deadlines for motions *in limine*, oppositions, and replies, and disclosure of defense expert notices. Dkt. No. 534. The Court granted the request on July 12, 2021. Dkt. No. 535.

Since the parties' July 11, 2021 modification request, the Government has extended a formal written plea offer to the defendant, which was set to expire tomorrow. This afternoon, however, the Government learned from defense counsel that, due to prison-related delays and limitations, counsel have not had sufficient time to review the plea agreement with the defendant in person. Accordingly, the Government agreed to extend the plea offer until Thursday July 29, 2021.

In the hope that the parties can use the time to complete a pretrial resolution, the parties respectfully request that the Court adjourn for five days—that is, until Wednesday August 4, 2021—the deadline for the filing of motions *in limine*. The parties note, however, that they do not want to encroach on the Court's opportunity to review and decide any motions *in limine* if the defendant does not accept the Government's plea offer. Accordingly, the parties are not requesting any adjournment of the August 13, 2021 deadline for oppositions to motions *in limine*, the August 20, 2021 deadline for replies, or any of the other pretrial deadlines in the Court's May 10, 2021 Order (Dkt. No. 511) or July 12, 2021 Order (Dkt. No. 535).


The parties thank the Court for its consideration of this request.

Hon. Jesse M. Furman
July 26, 2021

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Respectfully submitted,

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cc: Counsel of record (by ECF)